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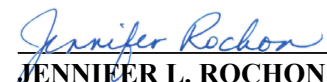
VIA ECF

Honorable Jennifer L. Rochon
U.S. District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

The requested adjournment of the post-discovery conference is GRANTED. The post-discovery conference is rescheduled to **January 7, 2025 at 11:30 a.m.**

SO ORDERED.

Date: November 20, 2024
New York, New York


JENNIFER L. ROCHON
United States District Judge

Re.: **Travelers Property Casualty Company of America v. Pennsylvania Lumbersmens Mutual Insurance Company; Docket No. 1:23-cv-10403**

Dear Judge Rochon:

This office represents the plaintiff, Travelers Property Casualty Company of America (“Travelers”), in connection with the above-referenced action. Pursuant to Section 1.F of Your Honor’s Individual Practices, Travelers and the defendant, Pennsylvania Lumbersmens Mutual Insurance Company (“Lumbersmens”) (collectively “the parties”) hereby submit this joint request for a forty-five (45) day adjournment of the parties’ November 22, 2024 post-discovery conference before Your Honor.

By way of brief background, this is an insurance coverage action by Travelers against Lumbersmens seeking a declaratory judgment that Lumbersmens is obligated to defend and indemnify Sciam Construction, LLC (“Sciam”) and Ogden Codman LLC (“Ogden”) (the “Underlying Defendants”) in connection with an underlying personal injury action captioned *Joese Zempoaltecatl-Pena v. Ogden Codman LLC, et al.*, pending in the Supreme Court of the State of New York, County of Bronx, Index No. 800488/2022E (the “Underlying Action”).

On August 23, 2024, the parties submitted a joint letter indicating that they have exchanged discovery and have engaged in advanced settlement discussion of this matter. On October 1, 2024, Travelers submitted a pre-motion conference request letter pursuant to Section 3.I of Your Honor’s Individual Practices. On October 11, 2024, Lumbersmens submitted a response to Travelers’ pre-motion conference request letter. On October 15, 2024, the parties submitted a joint letter requesting a 30-day adjournment of the post-discovery conference that was originally scheduled for October 22, 2024. This Court granted the adjournment and scheduled the post-discovery conference for November 22, 2024.

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company and its Property Casualty Affiliates.

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The parties have continued engaging in amicable settlement discussions and anticipate reaching a resolution within the next 45 days. Accordingly, the parties jointly request a 45-day adjournment of the November 22, 2024 conference to allow the parties to continue negotiations in the hope of settling the matter in lieu of motion practice. The parties request that the conference be adjourned to January 7, 2025, or a date thereafter. This is the second request for an adjournment of the post-discovery conference.

The parties further request that the Court adjourn the issuance of a summary judgment briefing schedule until after any potential pre-motion conference before Your Honor.

Thank you for Your Honor's attention and consideration.

Very truly yours,

/s/Logan A. Carducci

Logan A. Carducci

Cc: All Counsel of Record via CM/ECF